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November 19, 2024

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The Honorable David S. Jones
United States Bankruptcy Court for the Southern District of New York
One Bowling Green
New York, NY 10004

Re: *In re TransCare Corporation* (Adversary Proceeding No. 18-01021)

Dear Judge Jones:

We represent defendant Patriarch Partners Agency Services, LLC (“PPAS”) in the above-referenced action. At the November 7 hearing on the Trustee’s motion (ECF No. 169), Your Honor inquired whether any court has applied 11 U.S.C. § 550(d)’s single-satisfaction rule to allow or prohibit the recovery of a fees award. *Compare* Hr’g Tr. 20:21–21:16, with ECF No. 178 at 6. Although neither party has identified such an application, we have examined non-bankruptcy decisions based on the Court’s inquiry and have located several in which similar doctrines have been applied to preclude the recovery of legal fees. *See, e.g., Win Shields Prods., Inc. v. Greer*, 2017 WL 2774443, at *5–7 (Tex. App. June 27, 2017); *Kelco Disposal, Inc. v. Browning-Ferris Indus. of Vermont, Inc.*, 845 F.2d 404, 410–11 (2d Cir. 1988), *aff’d*, 492 U.S. 257 (1989). We would be happy to provide a short supplemental brief, or simply a list of citations, as the Court prefers.

Respectfully submitted,

/s/ Ronit Berkovich
Ronit Berkovich

cc: Jeffrey Chubak (by email)